

# **EXHIBIT A**

## **Complaint**

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1  
2 Tamara Speaks

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Electronically Filed  
12/15/2022

*Heather S. Hemin*  
CLERK OF THE COURT

6  
7 Tamara Speaks , In Proper Person

8  
9 EIGHTH JUDICIAL DISTRICT

10 CLARK COUNTY , NEVADA

11  
12  
13 TAMARA SPEAKS

14 vs. Plaintiff(s),

15 EMPLOYERS HOLDINGS INC.

16 DOES I THROUGH X, INCLUSIVE , AND ROE

17 Defendant(s).

Case No:

Dept. No:

A-22-862643-C  
Dept. 8

18  
19 COMPLAINT

20 Plaintiff, TAMARA SPEAKS, in proper person,

21 complains against Defendants , EMPLOYERS HOLDINGS INC.;

22 DOES I through X ,inclusive , and ROE Business Entities I through X, inclusive ,

23 as follows: Charge of Discrimination , Wrongful Termination , Harrassment ,

24 Retaliation and Disability .

1 I was harassed by Human Resources. For Example , but not limited to ,  
2 Human Resources saying they did not understand my disability  
3 and that I needed to have my doctor re-fill out my paperwork with more claification.  
4 When I first began working at EMPLOYERS INC., my FMLA/ADA was accepted.  
5 On or about March 27,2020, I re-submitted my FMLA paperwork.  
6 On or about April 1,2020, I was discharged for not updating my work passwords.  
7 I beleive I was discriminated against because of my disability , in violation  
8 of the Americans with Disabilities Act of 1990, as amended;  
9 My race, Black, my sex, female , in violation of Title VII of the Civil Rights Act of 1964.  
10 as amended my age over 40, in violation of the age discrimination in employment act  
11 of 1967., as amended retaliated against for engaing in protected activity.  
12 I beleive a class of individuals have been discriminated agaisnt due to their sex ,  
13 female , in violation of Title VII of the Civial Rights Act of 1964.

1 On or about June 5,2019 , I was hired by EMPLOYERS HOLDINGS, INC  
2 as a Supervisor of Claims Services .

3 My last postion title was Supervisor of Claims .

4 From in or around August 2019 to on or about April 1,2020 , I was subjected to  
5 unequal terms and conditions by Manager of Claims services, Kylie Pictum.

6 For Example , but not limited to Ms Pictum not training me on my Supervisory duties

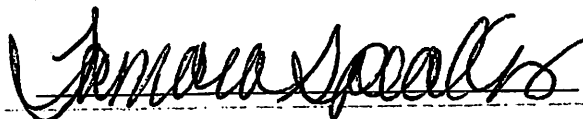
7 While training other associates in my supervisory duties and asking me to

8 Write up other balck employees, saying that they are Troublemakers .

9 I notified EMPLOYERS INC. Human Resources as well as my leadership team of the  
10 disparate treatment ;however no action was taken to investigate or promptly correct  
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22 DATED this 15 day December , 2022.

23 Pursuant to NRS 53.045, I declare under penalty of  
24 perjury that the foregoing is true and correct.

25  (signature)

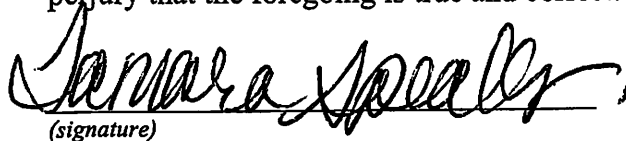
[USE THE FOLLOWING ONLY IF APPROPRIATE FOR YOUR SERVICE OF YOUR TYPE  
OF DOCUMENT.]

**CERTIFICATE OF MAILING**

I HEREBY CERTIFY that on the 15TH day of December,  
2022, I placed a true and correct copy of the foregoing ( in the United  
States Mail, with first-class postage prepaid, addressed to the following:

DATED this 15th day of December, 2022.

Pursuant to NRS 53.045, I declare under penalty of  
perjury that the foregoing is true and correct.

  
(signature)